

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ELIZABETH GOMES, EVA M. CONNORS,
JENNIFER BOWEN, KATISHA SHOULDERS,
KENNETH N. MARENGA, PAMELA PRISCO
CARPENTER, STEVEN PETERS, ZHANNA
KARP, Individually, and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

STATE STREET CORPORATION, STATE
STREET BANK & TRUST COMPANY, NORTH
AMERICA REGIONAL BENEFITS COMMITTEE
OF STATE STREET CORPORATION,
INVESTMENT COMMITTEE OF STATE
STREET CORPORATION, and
JANE and JOHN DOES 1-20,

Defendants.

Civil Action No. 1:21-cv-10863-MLW

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp (collectively, "Plaintiffs") respectfully submit their Motion for Preliminary Approval of Class Action Settlement, requesting the Court to: (1) preliminarily approve the Parties' Settlement Agreement; (2) approve the proposed Settlement notice and authorize distribution of the notice to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes under Federal Rule of Civil Procedure 23(a) and 23(b)(1); (4) schedule a Fairness Hearing; (5) appoint Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp as Settlement Class Representatives and appoint Scott+Scott

Attorneys at Law LLP as Class Counsel pursuant to Federal Rule of Civil Procedure 23(g); (6) approve the Plan of Allocation; and (7) enter the accompanying Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and the authorities cited therein, the Declaration of Garrett W. Wotkyns and exhibits attached thereto (including the Settlement Agreement attached as Exhibit A), the Declarations of Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp, and all files, records, and proceedings in this matter.

Dated: February 12, 2024

Respectfully submitted,
SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Garrett W. Wotkyns

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LOCAL RULE 7.1(A)(2) CERTIFICATE

I hereby certify that on February 12, 2024, counsel for Plaintiffs conferred with Counsel for Defendants, who assented to this Motion for Preliminary Approval of Class Action Settlement.

/s/ Garrett W. Wotkyns
Garrett W. Wotkyns, *admitted pro hac vice*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to send notification of such filing to all counsel of record.

/s/ Garrett W. Wotkyns
Garrett W. Wotkyns, *admitted pro hac vice*

Counsel for Plaintiffs